

Administrative Officer
Waste Action Plan Consultation
Waste Policy & Resource Efficiency
Department of Communications, Climate Action & Environment
Newtown Road
Wexford
Y35 AP90

21st February 2020

Re: Irish Asphalt-pavement Producers Association (IAPA) submission on your 'Waste Action Plan for a Circular Economy' document.

As the interest of our membership is primarily in List of Waste Class 17 03 02, 'bituminous mixtures not containing coal tar' our responses will relate to questions raised in Section 9, C & D Waste and Section 13, End of Waste

Section 9

1. What other measures need to be put in place to encourage all players to prevent and recycle waste from construction?

Because 'Reclaimed Asphalt' conforming to existing standard I.S. EN 13108-8 2005 is a 100% recyclable product as a constituent material in hot asphalt mixes, it is imperative that End of Waste criteria be established as a matter of urgency in order to promote and ensure that 100% 'closed loop' recycling can ultimately be achieved. Article 27 declarations as a By-product, currently being used in some cases, is unsatisfactory and leads to uncertainty.

2. What existing measures are in place that could be improved?

An EoW protocol in place would be much more effective than Article 27 declarations in encouraging many more asphalt producers to install recycling equipment on their existing plant, so that recycled asphalt products could be produced in much wider geographic areas.

3. What changes could be made to environmental and/or planning legislation to facilitate more recycling of construction waste?

Existing waste regulations could be more flexible towards waste streams that are 100% closed loop recyclable. EoW criteria are already in place Europe-wide for Glass and Scrap Metal; why not for Reclaimed Asphalt?

4. What incentives could be introduced to increase the use of recycled materials?

The economic and environmental benefits of recycling reclaimed asphalt are sufficient incentive to promote the practice; establishing EoW criteria as quickly as possible will incentivise all asphalt producers to engage. Allowing a higher % of reclaimed asphalt to be used in mixes (currently 30% max) would also help. The market for recycled asphalt is as unlimited as the market for conventional product produced from virgin aggregate and bitumen. Technical requirements already allow up to at least 80% of reclaimed asphalt to be incorporated in mixes in some countries.

5. Should levies be applied to the use of virgin material where a recycled material is available as an alternative?

There is absolutely no need for levies on virgin materials. The economics of recycling asphalt is more than sufficient to encourage its use; bitumen is a very valuable and expensive resource embedded in and reusable from reclaimed material. The certainty of having EoW criteria adopted will encourage all producers to engage and ensure maximum allowed use of reclaimed material in new hot mixes.

6. How can site managers be encouraged to ensure more on-site segregation? What financial incentives / penalties could be introduced to encourage better waste management practices?

The value of reclaimed asphalt is so high that its use as anything but constituent material in new asphalt mix makes no sense. Should EoW criteria prohibit alternative uses such as fill or unbound sub-base materials? They should also set storage requirements relating to impervious floor area, positive drainage and runoff silt and hydrocarbon traps.

7. What are the best approaches to raising awareness and education?

For our industry public awareness is not an issue and industry awareness is already high profile, being well covered at seminars and in committees. Full 100% recycling of reclaimed asphalt is already well recognised as the correct solution; EoW protocol, when introduced, will drive industry in that direction. Economic advantages to all stakeholders will also be a huge driver.

8. What are the barriers/enablers to these measures?

IAPA, in conjunction with ICF submitted a proposal to the EPA for an 'End of Waste' protocol in 2015. Progress has been very slow on this and to date Article 27 declarations have not been responded to. However, we are pleased to note that in Section 13, EoW, of this document it is stated that "Regional Waste Management offices will achieve End of Waste for road-planings in 2020". We are involved in this process on an on-going basis and will be delighted welcome an early conclusion

9. Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

Where 100% closed loop recycling is possible, as in our case with reclaimed asphalt, priority needs to be given to setting up the regulatory structures to allow this to happen with the proper controls and incentives in place, as quickly as at all possible. Our industry is eager and ready to engage at each step on the way and we will do our utmost to expedite the introduction of EoW for reclaimed asphalt as a matter of urgency

Many thanks for this opportunity to respond to your 'Waste Action Plan for a Circular Economy'. If I can be of any further assistance please let me know on 087 2552460 or email iapa@irishconcrete.ie

IAPA and our members will be happy to meet with your representatives at any time.

Kind regards

Edmund Hegarty, CEO, Irish Asphalt-pavement Producers Association (IAPA)

